

Home Energy Conservation Act 2021 Report

Note: All questions have a 4000-character limit (Approx. 500 words)

1) Introductory Questions

- **Name of Local Authority**
Trafford Council
- **Type of Local Authority**
Metropolitan Borough Council
- **Name, job title and email address of official submitting report**
Richard Firth, Team Leader – Housing Standards richard.firth@trafford.gov.uk

2) Headline and Overview

- **Does your Local Authority have a current strategy on carbon reduction and / or energy efficiency for domestic or non-domestic properties?**

If yes, please provide a link

Greater Manchester Combined Authority (GMCA) wide strategies:

5 Year Environment Plan

In this, Greater Manchester sets an ambition to be carbon neutral by 2038. Reducing the amount of energy used in Greater Manchester's existing buildings will be key to achieving this aim, especially given 95% of Greater Manchester's existing buildings are still likely to be in use by 2050.

<https://www.greatermanchester-ca.gov.uk/what-we-do/environment/five-year-environment-plan/>

Report on Decarbonising Our Existing Buildings

This report builds on the priorities and actions on buildings in the Five-Year Environment Plan. It sets out where Greater Manchester is now and where it needs to get to in terms of the energy demand of its existing domestic, commercial and public buildings. Based on that, it provides a set of recommendations for taking action that are being taken forward by the Greater Manchester Combined Authority (GMCA) and its partners.

<https://www.greatermanchester-ca.gov.uk/what-we-do/environment/homes-workplaces-and-public-buildings/domestic-and-non-domestic-energy-efficiency/>

The Global Covenant of Mayors for Climate and Energy

The Global Covenant of Mayors for Climate and Energy requires Greater Manchester to set targets aligned with or exceeding an 80% emissions reduction by 2050, and to achieve a 40% reduction between 2005 and 2030. (Greater Manchester has delivered c26% between 1990 and 2013). The commitment also requires comprehensive action planning, monitoring and reporting using their specific methodologies.

<https://www.globalcovenantofmayors.org/>

In 2020 Trafford Council published our Carbon Neutral Action Plan. It includes a Carbon Neutral Framework developed by climate change consultants Anthesis. Our Action Plan aims for carbon neutrality by 2038, aligned with the GM 5 Year Environment Plan and overseen by a cross-sectoral Trafford Climate Emergency and Air Quality Commission.

- **If no, are you planning to develop one**

N/A

- **What scheme(s) is your Local Authority planning to implement in support of energy saving / carbon reduction in residential accommodation properties in the next two years?**

Green Homes Grant Local Authority Delivery (GHG)

The scheme aims to:

- Tackle fuel poverty by increasing low-income homes' energy efficiency rating while reducing their energy bills.
- Deliver cost effective carbon savings to carbon budgets and progress towards the UK's target for net zero by 2050.
- Support clean growth and ensure homes are thermally comfortable, efficient, and well adapted to climate change.
- Support economic resilience and a green recovery in response to the economic impacts of Covid-19, creating thousands of jobs.

The scheme provides money towards energy efficient measures, such as:

- External wall insulation
- Air Source Heat Pumps (low carbon heating)
- Underfloor insulation
- Room in roof insulation
- Window replacements (single glazed)
- Door replacements
- Smart heating controls
- Solar PV

GM Retrofit Accelerator (subject to procurement) (RA)

The Retrofit Accelerator, which is in the developmental stage at present, will look to:

- Engage with those customers (residents and landlords) who make up 31% of households identified as willing to pay for retrofit Greater Manchester.
- Cover all housing archetypes and tenures across all 10 districts.
- Facilitate an unbiased home assessment to inform the customer as to what measures can be done, in what order, to achieve the best results or, if a pick and mix approach is taken to installing the measures, offers a pathway of least future regret.
- Explain to the customer the associated costs and benefits of the measures.
- Create a bespoke offer to the customer covering finance options, levels of quality assurance, warranties, and delivery options.
- Subject to the route taken by the customer, engage the supply chain and manage the installation of the measures and secure sign off, once the work complete.
- Become a self-financing entity, where customers are offered attractive packages that meet their needs, at this point the estimated market size in GM over the next 5 years is £5.4bn.

Energy Company Obligation (ECO)

The ECO scheme, currently managed by energy suppliers, is available to fund energy efficiency measures in eligible owner-occupier and private rented properties to assist them making their homes more energy efficient and reducing fuel poverty.

Local Energy Advice Partnership (LEAP)

The LEAP scheme offers an outreach service to low income and vulnerable households of all tenures. It provides home energy advice visits, income maximisation advice, some simple energy efficiency measures (e.g. draught excluders, LED light bulbs) plus onwards referral for larger energy efficiency measures via ECO.

Emergency Central Heating Offer (ECHO)

The ECHO scheme provides ECO-eligible homeowners whose gas boiler has broken down with a fully-funded emergency repair or replacement.

Connected to Warmth Scheme

The Connected to Warmth Scheme is for the installation of 1st time central heating systems, and includes installation of a gas supply, where possible.

- **What has been, or will be, the cost(s) of running and administering the scheme(s), such as the value of grants and other support made available, plus any other costs incurred (such as administration) as desired.**

Green Homes Grant Local Authority Delivery (GHG):

GMCA has secured £10.3 million of funding to run the Green Homes Grant Local Authority Delivery scheme in Greater Manchester. All improvement works are to be completed by 30

June 2021 for GHG LAD Phase 1a and 30 September 2021 for GHG Phase 1b.

Up to 15% has been allocated to support programme admin, legal, procurement, marketing, and wider installation ancillary costs.

For owner-occupiers, the grant will cover 100% of the cost of the improvements up to a maximum government contribution of £10,000.

For landlords, the grant will cover two-thirds of the cost of eligible improvements, up to a maximum government contribution of £5,000.

GM Retrofit Accelerator (RA)

The initial costs are anticipated to be circa £250k with input from the procured partner(s) on top.

For the LEAP, ECO and ECHO schemes there are no costs incurred to the local authority, other than staff time for making referrals to the programme and attending multi-agency meetings.

- **What businesses, charities, third sector organisations or other stakeholders do you work with to deliver the scheme(s)?**

Green Homes Grant Local Authority Delivery (GHG):

This scheme works in conjunction with all 10 Greater Manchester local authorities in partnership with our delivery agent E.ON, who utilise a supply chain of local installers. Delivery of the scheme also includes several Social Housing providers from across the region. Both elements are supported by the Growth Company to ensure gaps in supply chains are supported, while providing a route for local suppliers to be engaged.

In delivering LEAP, ECHO and ECO, districts work with AgilityEco and E-on, who coordinate and project manage these programmes. On the ground, LEAP is delivered by Groundwork and Citizens Advice Manchester, and the Warm Homes Fund measures are installed by Engie.

- **What has been, or will be, the outcome of the scheme(s)? These outcomes could include energy savings, carbon savings, economic impacts such as job creation and / or increased business competitiveness or societal impacts such as alleviation of fuel poverty and / or improved health outcomes etc.**

Green Homes Grant Local Authority Delivery (GHG):

The scheme aims to raise the energy efficiency of low-income and low EPC rated homes (those with Band D, E, F or G) including those living in the worst quality off-gas grid homes, delivering progress towards reducing fuel poverty, the phasing out the installation of high carbon fossil fuel heating and the UK's commitment to net zero by 2050.

Additionally, the scheme will seek to support local suppliers and jobs while providing wider economic impact.

GM Retrofit Accelerator (RA)

Potential outcomes include and are not limited to:

- Creation of a local market for domestic retrofit with national significance
- Opportunity to support local supply chains, apprenticeships, and employment initiatives through deployment at scale.
- Ability to leverage private sector investment.
- Increase in disposable income for residents.
- Increased levels of comfort and wellbeing with reduced levels of fuel poverty
- Ability to design and sell a suite of retrofit products and services into national markets.
- Utilisation of existing networks for potential suppliers / consortia members

As of the end of April, the Warm Homes Fund has delivered first time central heating in 228 households. This scheme is now closed and is due to restart in Autumn 2021. The scheme is leading to an average improvement of 2 EPC bands in the fuel poor households it is supporting, and corresponding savings and/or increase in thermal comfort.

During January 2020 to March 2021 over 634 households have been visited through the LEAP programme, with a total estimated energy saving of £31,000.

3) Communications

- **Does your Local Authority provide any advisory services to customers on how to save energy?**

No, only sign posting to national and local advisory organisations.

- **If yes, please briefly outline how this is undertaken.**

N/a

- **How do you communicate or encourage energy saving amongst domestic consumers and / or local businesses?**

Trafford Council provide advice on energy efficiency advice and schemes by email, Council webpages, telephone and face-to-face advice during visits/inspections.

Free energy advice and visits, through the LEAP programme, are available to fuel poor households. Households can be referred to the scheme (e.g. through GP or other LA services) or self-referral. They are then visited by a Home Energy Advisor who provides

advice on energy efficiency, bill savings and wider income maximisation.

E-on is the GMCA delivery partner for GHG and carry out Home Energy Surveys in response to applications for this scheme.

The GM Business Growth Hub delivers support for both businesses looking to become more environmentally friendly and for businesses operating in the environmental service sector. Their service is called Green Growth and they act on behalf of all GM local authorities: <https://www.green-growth.org.uk>

4) Local Green Supply Chain

- **Have you made any assessment, or undertaken any analysis of the existing capacity in your local energy efficiency retrofit supply chain to support the decarbonisation of buildings by 2050? If Yes, please summarise the outcomes.**

Trafford Council is part of the GMCA led Public Sector Decarbonisation Scheme bid via Salix, which has involved analysis and mapping of the energy efficiency retrofit supply chain via GMCA and The Business Growth Hub as part of the current implementation phase up to September 2021.

- **What actions are you taking, if any, to upskill and / or grow the local energy efficiency installer supply chain? This could include the facilitation of training, and local installer networking opportunities.**

We are embarking on a project, Retrofit Accelerator, which is aimed at growing the local energy market. See above for further information.

In addition, the Trafford Inclusive Economy Recovery Plan highlights the importance of taking advantage of opportunities to grow the green economy and to re-skill and up-skill our workforce for new / emerging /growth sectors.

Research is taking place to detail jobs roles needed for such growing sectors, including qualifications / skills needed with details provided to Careers advisers, Connexions advisers working in schools to promote such opportunities to young people. We are also working with Greater Manchester Combined Authority and Greater Manchester Local Enterprise Partnership to provide a blueprint for building a fairer, greener and growing economy.

- **What actions are you taking, if any, to promote energy efficiency and the installer supply chain to consumers, and encourage households to consider energy retrofit?**

We use social media, press and targeted mail to promote energy efficiency, which is

supported by the following campaigns:

For the GHG scheme, we have conducted mail outs to residents, to promote energy efficiency, this has been effective and resulted in substantial uptake of the scheme.

Through the Retrofit Accelerator, the GMCA is aiming to develop a pipeline to promote energy efficiency and encourage householders to retrofit.

- **If no action is taking place in either of these two areas, please let us know of any barriers you have encountered.**

N/A

- **How effectively is your LA able to engage (Trustmark / PAS2035 / PAS2030 certified) installers?**

We are working in partnership with E.ON, the Growth Hub and with our registered social providers to engage certified installers. This has not been without its challenges. However, by providing myth busting advice (Growth Hub), access to contracts and steadily increasing delivery we have been successful to date.

- **Do you have any plans to develop policies or initiatives in this space over the next five years as part of supporting your local decarbonisation efforts?**

We are in the process of developing a new initiative, Retrofit Accelerator, see above.

Also continued work with GMCA teams, the Business Growth Hub, GMCA Council Inclusive Economy and Communities Team, Inclusive Economy Recovery Plan and Trafford Partnership Inclusive Economy strategic board.

5) Social Housing

- **What action, if any, has your LA taken to install energy efficiency or low carbon heat measures in social housing? Have these been installed to a satisfactory quality? What actions (if any) have your social housing partners taken?**

The GMCA is supporting the region's social housing providers, with technical support and different funding programs including:

- **GHG:** The program is currently supporting 9 social landlords to upgrade 697 social rented homes. These are all being installed in accordance with the PAS2030 / 2035.
- **ERDF:** The region through our ERDF intermediary body status is funding 2 projects Homes as Energy Systems and Southway Housing's Arrow field Park to deliver measures across social rented homes. These measures include EWI, Solar PV, ASHPs, GSHPs, smart controls and battery storage.

Trafford Council is not a stock holding authority. We have contacted the main social housing providers operating in Trafford and their individual responses are below:

Trafford Housing Trust (THT) - over the period of 2019-21 they have completed very few installations; 18 loft installations and 9 cavity wall fills. This period has mainly been used for planning – they have developed a costed, B and C and Zero Carbon Strategy for their housing stock. The plan is being discussed with the Board in April and Oct 2021.

Great Places Housing Group (GP) have not fitted any energy efficiency or low carbon heat measures in social housing within Trafford since March 2020. However, over the last few years they have retrofitted 32 Trafford properties with solar PV and installed external cavity wall and loft insulation in 34 Trafford properties. 9 properties had loft insulation fitted and 2 of those also had hot water tank jackets fitted.

Your Housing Group (YHG) have installed solar thermal/PV to 1 block of 12 flats, 26 domestic dwellings, 1 community centre and 1 office in the Trafford area. They are examining the feasibility of installing GSHP or WSHP to housing in Partington.

Irwell Valley (IV) - no low carbon heat measures have been fitted to IV properties in Trafford. They have recently trialled solar PV systems that will help with heating costs, but heat is not the primary reason for install.

Arawak Walton have 77 properties in Trafford and 4 developments that have been built in the last 10 years; 35 units in all have been built to high environmental standards. Measures have included high standards of thermal comfort, heat exchange heating systems, loft insulation, cycle stores, double glazing and low energy lighting.

Mosscaire St Vincent's (MSV) stock in Trafford is predominately a C rating; they are currently looking to improve the SAP on properties less than a C rating.

Jigsaw Homes Group (JHG) have approximately 830 properties within Trafford. Of those a considerable number are relatively new build with other properties having EPC ratings of C and above (over 500).

Onward Homes are undertaking a review of their properties to identify energy retrofit priorities.

Anchor Hanover Group (AHG) have not installed any energy efficiency or low carbon heat measures over the past 12 months in Trafford.

- **Do you have easy access to the information / knowledge within your organisation that you would expect to need for social housing retrofit projects? (e.g. stock condition; property data; approach to procurement; alignment with existing internal maintenance / upgrade plans; tenant engagement and management plans; costings)**

Stock condition and property data: Pathways to Healthy Net Zero Housing for Greater Manchester report by Parity Projects utilised a housing stock data baseline for each of the 1.2 million homes in Greater Manchester, including social housing stock, to model the range of pathways to Net Zero in housing by 2038. This is supplemented by an in-depth look at housing health and safety risks, and dynamic modelling of six archetype homes.

The modelled data contains 40 variables, including information on:

- The property - property type, age, tenure, flat rise and floor, building area.
- Building fabric - window type and glazing, wall type, roof type and insulation.
- Heating system - main / secondary heating and fuel types and SAP rating.
- Hot water tank.
- Solar PV.
- SAP, EPC and EI certificates.
- Fuel use, bills and carbon produced.

This project has also produced a dataset modelling the likelihood of homes containing a Category 1 HHSRS hazard.

The dataset and the queries that have been built with it will help to identify the scale of retrofit required and support the development of business cases to unlock investment opportunities and identify areas and type of properties for different types of intervention.

Trafford Council is not a stock holding authority. We have contacted the main social housing providers operating in Trafford and their individual responses are below:

THT are missing EPCs on 30% of their stock and recognise the need to fill this gap over the coming years. They have sufficient information to generate financial models and retrofit schemes.

GP current use the database PIMMS to store stock condition data for their properties. Surveys are completed every 5 years. Tenant contact details are readily available to allow for tenant engagement before, during and after works are completed.

YHG use Keystone asset management system to hold all data relating to asset and component details listing install and renewal dates. YHG also process all component replacements whether planned or reactive via keystone, thus providing up to date information and allowing us to plan and prioritise work into our future upgrade plans and our ongoing maintenance requirements. YHG are currently undertaking 30% this year and next year; then 20% year on year stock condition surveys, and 5% validations of previous surveys to hold accurate data in their system – these aids planning and forecasting.

IVH confirmed this information is available through their Stock Condition surveys and is complimented by Sustainability, Customer Voice and Asset Management strategies.

Arawak Walton, MSV and AHG reported having full access to this information.

JHG have stock condition data, property data, robust procurement methodology and ongoing investment programmes to their properties. They are developing energy efficiency/sustainability investment programmes for delivery 2021/22 – approx. 32 properties in Trafford identified.

Onward Homes use a database to stores information for all individual properties to include stock condition, property data, approach to procurement, alignment with existing internal maintenance/upgrade plans, tenant engagement and management plans, costings etc.

- **If no, would it be easy / difficult to obtain this information?**

N/A

- **Have you experienced any challenges to retrofit, including during any previous government schemes you have taken part in (e.g. supply chain, funding, tenant cooperation, mixed tenure, split incentive, policy clarity, etc)? Please provide some detail. Have social housing partners reported any challenges to retrofit?**

The principal barriers to delivery of retrofit across the social housing sector in GM remain:

- Financing / cost recovery.
- Planning.
- Law of diminishing returns.
- Impacts on fuel poverty.

Social housing providers must invest in their properties to meet many different requirements including electrical and gas safety, fire risk, 'decency', physical and mental ability related adaptations. The cost of incorporating low carbon 'retrofit' measures at scale within asset

management plans compromises the delivery of regulated investment priorities. There are examples of where retrofit measures mitigate some of these costs (e.g., a heat pump install removes 'gas risk'). However, limited budgets don't allow these measures to be deployed in meaningful quantities. Without additional financial support retrofit remains a 'nice to have' investment for most social landlords. Where no additional capital funding support is provided, mechanisms to recover additional investment from tenants should be made more widely available. Given the regulation around the calculation of social and affordable rent landlords are unable to amend rent structures to recover increased capital investment which, primarily, benefits the tenant.

The installation of certain measures, mostly EWI and ASHP, can be frustrated by local planning rules. Planning can be required where landlords are installing multiple ASHP units on a single building (e.g. low rise flats) or in a closely defined area. Some authorities have noise level restrictions which even the quietest ASHP unit can fall foul of.

Social landlords could be seen as victims of their own success in relation to the average energy performance of their stock. Regular cyclical investment in their buildings means a higher energy efficient stock. There are of course a number of solid fuel, solid wall and conservation area properties but, in the main, the cost-effective fabric measures have mostly been installed. Further energy efficiency works become less 'cost effective' given the smaller amounts of carbon savings they deliver and the argument for investment becomes harder to support.

Having delivered most cost-effective fabric interventions, low carbon heating remains an option and it has been recognised in the Parity dataset outlined above that fossil fuel heating has no place within a net zero housing portfolio. As a result of the way environmental levies are applied to electricity bills, rather than gas bills, means electricity is the more expensive fuel on a per kWh basis. The switch from a fossil fuel heating system to a lower carbon electrified heating system can result in an increase in fuel bills. Running costs can be made worse if there is a lack of understanding on how heat pump systems operate.

- **How does your LA currently/how will your LA in future plan to go about identifying suitable housing stock and measures for retrofit? How do social housing partners identify suitable stock? By the same measures or via a different method?**

The Parity dataset outlined above and the queries that have been built with it will enable the GM LAs to identify housing stock / areas for potential retrofit measures. The report also contains several potential pathways to net zero housing, modelling the impact of combinations of fabric interventions, fossil gas upgrades, rollout of heat pumps and photovoltaics on GM's housing stock. It is planned that this data will be shared with the GM Housing Providers so that they can use it to help identify suitable stock, alongside their own data and asset management information.

- **What considerations would make you more or less likely to apply for government funding? If known, what is the opinion of your social housing partners?**

Moving away from only E, F and G rated properties would increase the number of dwellings social landlords could include in domestic retrofit projects and increase the attractiveness of future funding.

Recent programmes have had incredibly short delivery timescales that have dissuaded social landlords from applying or participating in bids. The focus on a very small proportion of landlords' stock (E, F and G properties and to a lesser extent, D rated homes) exacerbates the effort to procure and deliver a scheme outweighing the 'benefit'.

Recognising again that the majority of cost-effective fabric interventions have already been delivered, low carbon generation (namely solar PV) coupled with low carbon heating represents a very real investment opportunity that delivers a cost-effective route to net zero housing. Allowing solar PV without restriction of number of systems but with a caveat of a low carbon heating system being installed at the same time (or with a binding commitment to install one within a set timeframe) would help overcome concerns around increasing tenants bills from switching to electrified heating systems whilst also reducing carbon emissions.

THT would be more likely to apply for funding if the requirement to demonstrate household income was removed. Imposing income caps and SAP quotas make scheme assembly difficult, increases costs, and reduces impact.

GP state their considerations are what proportion the funding covers, level of energy efficiency achieved, what measures are fitted, and timescales (long-term funding rather than short term).

YHG more likely to apply for funding if better knowledge of funding available, simplified application processes - support from external consultants needed for complex applications. Access to public domain information i.e. easy access to EPC data.

IVH state timescales for applications need to be realistic. More likely to apply for funds if process was easy and flexible, and clarity and support was provided. e.g. guidance on including properties in a scheme that may not meet grant requirements due to previous measures given an EPC rating just outside the requirement. Also, inclusion of owner occupiers to bring them into the same grant now GHG has closed.

Arawak Walton they would apply if they were aware of the grants available. It needs to be easy to access, include flexible solutions for older properties.

MSV would be more likely to apply for 100% funding with easier access. They would be less likely if grants are focused on Match Funding and Planning.

JHG funding needs to be more accessible with fewer restrictions on earnings levels of

residents that are not the homeowners.

Onward Homes funding needs to be practical and should dove-tail with housing priorities for particular areas. It should There needs to be less 'red tape' to apply for funding, timeframes need to be realistic, and reporting schedules need to be practical.

AHG applications need to be less complex, less restrictive, more guidance on eligibly criteria. Less likely to apply if eligibility criteria is restricted and available funding reduced.

- **To what extent are social housing tenants willing or unwilling to undergo retrofit, and what are the barriers and facilitators to their participation? If known, is this the same opinion across all social housing tenants or is it different with HA and ALMO tenants?**

Lack of tenant participation in retrofit schemes can be attributed to three primary reasons:

- Disruption
- Perception
- Choice

Tenants may not want to live through works which can be messy, impact on their daily lives and require 'strangers' in their home. Low carbon heating systems require thermal storage (hot water cylinder) and losing floor space for a cylinder can dissuade participation.

Perception of the benefit can impact on willingness to participate. Double glazing remains a popular measure despite relatively modest energy savings. New kitchens and bathrooms are valued whereas IWI or an ASHP are less so. They view that combi-boiler heating is the 'best option', with certain brands being desirable. Equally, tenants assume that a low carbon heating system, with an output of 8kW, is a lesser solution compared to a 24kW boiler.

Reponses from individual social housing partners across Trafford:

THT tenants are usually willing to accept measures, although they have yet to test them with internal wall insulation. Low carbon heating is unpopular and considerable resources required to educate and support customers with this technology.

GP to look improve energy efficiency in their lowest performing stock, so customers are generally happy to engage. Barriers to engagement include the tenant's lifestyles.

YHG some opposition to ASHP's as a number of tenants receive large discounts from the coal industry (due to working in the industry) and provided a discounted form of heating for them. No barriers for the provision of the GSHP systems – tenants were happy to have inefficient night storage heating replaced.

IVH found that commencing the engagement process as early as possible was key to

allaying concerns or issues. Generally, the barrier would be having enough time engage.

Arawak Walton have not had resistance to the measures introduced so far e.g. better heating systems, insulation, windows and doors. Their tenants struggle with alternative heating systems so it depends what measures are installed. Working on building fabric might be very disruptive which will disrupt daily life and decoration.

MSV's tenants engage if their utility costs reduced and works are not too intrusive. Older people less willing, particularly if a more complicated system.

JHG many of their tenants are reluctant to share personal information for grant bids.

Onward Homes the most common barriers have been the disruption to tenants caused by the works, impact on energy costs, new technologies taking up more space, operating complicated systems after install.

AHG's residents will engage if they can understand and realise the benefits and it is of little or no cost to them. Barriers include lack of understanding, disruption & cost to them.

- **Does the approach to retrofit change for leaseholders in mixed tenure blocks? What encourages them to co-operate?**

It is very much dependent on the measure.

Certain retrofit solutions such as shared loop GSHP can be designed and installed without the need for the leaseholder to participate. If they choose not to, they can remain on their current electric heating system or, where a gas system has been removed, landlords can provide the most cost-effective solution that meets the terms of the lease if the leaseholder is not prepared to contribute towards the GSHP solution.

Insulation schemes on flats are relatively straightforward as it is not practical or viable to not insulate a single leaseholder flat mid-way up a tower block. Low rise homes are a little more complex and leaseholder participation (or lack of) has, in relation to EWI schemes, created 'rotten teeth' within a row of terraces.

The primary challenge to leaseholder participation in retrofit schemes is financial. If the property is well maintained to a standard that the retrofit intervention can be applied without remedial or enabling works (which is often not the case due to underinvestment in a property by the owner occupier) there remains significant capital outlay to fund the installation of the retrofit measure itself running into thousands of pounds. Contractors working on social housing investment programmes are encouraged to offer works to leaseholders or owner occupiers in the areas they are working, but many social housing focused contractors are not prepared to take on the financial risk associated with working on 'private' properties – their business models are predicated on working for a single, social housing or public sector client, and not being reliant on securing myriad small sums from

owner occupiers or leaseholders. Low cost / 0% public sector loan (equity loan) or grant payable to the installation contractor by the public sector on behalf of the leaseholder covering the cost of works would facilitate participation.

6) Domestic Private Rented Sector (PRS) Minimum Energy Efficiency Standards

- **Is your authority aware of the PRS Minimum Efficiency Standards regulations requiring private rentals in England and Wales to meet a minimum energy performance rating of EPC Band E as of April 2020, unless a valid exemption applies?**

Yes

- **Which team within your authority is responsible for, leading on enforcement of the PRS minimum standard? Please provide the contact details of the person leading this team.**

Regulatory Services
Suzanne Whitaker – 0161 912 4911

- **What method or methods does your authority use to communicate with landlords and tenants about the standards and other related issues?**

We operate a Landlords Forum within Trafford to provide legislative updates to landlords. We provide information via the Council's website and social media platforms for landlords and tenants. Enforcement staff meet with landlords and tenants during inspections and provide verbal and written advice on housing standards.

- **What barriers, if any, does your local authority face enforcing these regulations (e.g. identifying non-compliant properties / landlords, budgeting / resourcing, any legal issues)?**

Resources. A small housing standards enforcement team significantly limits our ability to proactively identify non-compliant properties/landlords. There is an over-lap with the Housing Act 2004 HHSRS and often the team will deal with excess cold issues under HHSRS, rather than this legislation, as part of wider property inspection when dealing with other deficiencies across the property.

- **Do you directly target landlords of EPC F and G rated properties to enforce these regulations? If yes, how? If no, please explain.**

No, but we are considering a proactive project in this area, depending on resources. Housing Standards Team investigate complaints as they arise.

7) Financial Support for Energy Efficiency

Where possible, please set out your answers to the following questions by tenure (owner occupied, privately rented, or social housing).

- **What financial programmes, if any, do you have to promote domestic energy efficiency or energy saving? If applicable please outline the budget (and % of the budget that is used), where such funding is sourced and where it is targeted.**

Trafford Council has no specific financial programmes to promote domestic energy efficiency or energy saving as this is done in partnership across Greater Manchester as a combined authority. For Owner Occupiers, Private Rented Sector & Social Housing we have the Green Homes Grant Local Authority Delivery Scheme project, please see above, the total budget for this project is currently £10.3M.

- **What future investment for energy efficiency or low carbon heat measures do you have planned, and when are these investments planned for?**

Bids for a share of funding for the Government's GHG LADs Phase 2 have been placed via the Regional Energy Hubs.

As part of the successful GM Public Sector Decarbonisation Scheme bid to Salix/BEIS, Trafford Council has 14 buildings included featuring a range of energy efficiency and heat decarbonisation measures to a value of c £4m, to be delivered by September 2021.

8) Fuel Poverty

- **Does your Local Authority have a Fuel Poverty Strategy?**

Trafford Council does not have a specific fuel poverty strategy. However, addressing fuel poverty is one of our actions within the Council's wider Poverty Strategy. We don't have a separate work stream or strategy for this as anyone experiencing fuel poverty is incidentally experiencing poverty as a whole so it can't be differentiated.

<https://www.trafford.gov.uk/about-your-council/strategies-plans-and-policies/docs/Trafford-Poverty-Strategy-2021-22.pdf>

- **What steps have you taken to identify residents / properties in fuel poverty? What blockers, if any, have there been in identifying households in fuel poverty?**

GMCA, on behalf of the 10 districts, publishes a Statement of Intent (Sol) to demonstrate how it identifies residents in fuel poverty. In addition, it has also undertaken mapping work which indicates in which areas of the city region fuel poverty is most prevalent. Identifying eligible households is done via the Sol.

In previous projects, we have utilised index of multiple deprivation data to target appropriate households for energy efficiency measures. We have sometimes found this data to be inaccurate and for there to be pockets of deprivation in affluent areas etc.

Trafford Council has also recently completed a stock condition survey; this will provide information on identifying those areas within the Borough where fuel poverty may be more likely to exist.

- **How does fuel poverty interlink with your local authority's overall Carbon Reduction Strategy?**

By improving the energy efficiency of homes in Greater Manchester, householders should see a decrease in their utility bills; this may assist in the alleviation of fuel poverty for some GM residents.

Carbon reduction and fuel poverty are addressed in Trafford Council's Poverty Strategy. Linked to the aims in the Carbon Neutral Action Plan, the Poverty Strategy reiterates the aspiration of the Council to 'Improve the energy efficiency of properties to reduce fuel costs' and 'Consider how climate change mitigation measures such as sustainable fuel sources will help to reduce and alleviate' poverty in the borough.

Fuel poverty modelling and analysis is also available through a GMCA study commissioned via Parity Projects. The Council will be involved in this work and use the data to support relevant strategies such as the Carbon Neutral Action Plan, Local Plan, Inclusive Economy Recovery Plan, Poverty Strategy and Housing Strategy.

Trafford Council as one of the ten Local Authorities across Greater Manchester is involved with the GM 5 year Environment Plan 2019-2024.

- **Please highlight any fuel poverty issues specific to your area.**

Across the borough there are some areas of traditionally built homes that due to their age and design are hard to treat in respect of retrofit energy efficiency measures, i.e. require costly measures or specific expertise e.g. thumbnail cavity, solid wall insulation.

Engagement in energy efficiency measures often limited due to high costs associated with solid wall insulation measures, disturbance/disruption and reduced public confidence in the availability of funding. Short time frames for delivering these schemes and short-term

budget availability limits the Council's ability to promote and implement schemes of over a longer term.

- **What measures or initiatives have you taken to promote fuel cost reduction for those in fuel poverty? Include information on partnerships with local businesses or energy providers you have.**

Through the GHG project, in conjunction with E.ON, see above for details and measures, we have promoted energy efficiency works on fuel poor houses, which will see a reduction in householder fuel bills.

In addition, we support and publicise the Energyworks scheme, the Local Energy Advice Partnership and other grants that can help people switch energy supplier and make their home more energy efficient and warmer.

See above for ECO, LEAP and ECHO schemes

9) Green Homes Grant Local Authority Delivery

Of the £2bn Green Homes Grant scheme introduced in summer 2020, £500m was assigned for Local Authority Delivery (LAD). LAD enables Local Authorities to bid for grant funding to support low income households in their area with energy efficiency and low carbon heating upgrades. £200m was made available through Local Authority grant competitions in 2020, known as phases 1A and 1B and £300m was allocated under Phase 2 between the five regional Local Energy Hubs.

- **Has your Local Authority Participated in GHG: LAD?**

Yes

- **If yes, please indicate which phase you participated in and briefly outline the project. o If no, please indicate what barriers prevented you from participation in the scheme.**

GMCA is currently participating in phase 1A and 1B of GHG: LAD and is in the process of contracting c£17m for phase 2. Under phase 1a, we are intending to target 630 measures to a total of 517 properties. Under phase 1b, we are intending to target 821 measures to a total of 821 properties. The overall breakdown of measures anticipated to be installed includes:

- Solid wall insulation = 499
- ASHP = 205
- Underfloor insulation = 23
- Room in roof insulation = 23

- Window replacements = 23
- Door replacements = 45
- Smart heating controls = 45
- Solar PV = 577
- Cavity Wall Insulation = 11

GMCA is in the process of contracting an additional c£17M of GHG to expand our existing GHG programme from £10.3M to c£27M, extending delivery timescales from September to December 2021.

- **If no, please indicate what barriers prevented you from participation in the scheme**

N/a

- **Would your Local Authority be in a position to manage the delivery of upgrades through a scheme such as LAD in 2022?**

Not as a single authority, but yes if working alongside colleagues from the GMCA, as per the current GHG LADs scheme.

- **If yes, please indicate the anticipated number of homes that could be upgraded per year.**

Yes. As part of GMCA we have systems already in place, a delivery agent, tools to identify suitable properties / residents. Based on our current abilities / achievements from the GHG LAD scheme we could confidently upgrade around 5,000 properties in 2022.

- **If no, please indicate what barriers would prevent you from delivering upgrades in your area.**

N/a

10) The Energy Company Obligation (ECO)

The Energy Company Obligation (ECO) is an obligation on energy suppliers aimed at helping households cut their energy bills and reduce carbon emissions by installing energy saving measures. Following the Spring 2018 consultation, the Government set out in its response that ECO3 will fully focus on Affordable Warmth – low income, vulnerable and fuel poor households.

The ECO “Local Authority flexible eligibility” (LA Flex) programme allows LAs to make declarations determining that certain households in fuel poverty or with occupants on low incomes and vulnerable to the effects of cold homes, are referred to ECO obligated suppliers for support under the Affordable Warmth element of ECO.

LAs involved in the LA Flex programme are required to issue a Statement of Intent that they are going to identify households as eligible, and the criteria they are going to use; and a declaration that the LA has been consulted on the installation of measures in a home.

- **Has your local authority published a Statement of Intent (Sol) for ECO flexibility eligibility? (Y/N)**

Yes. In Greater Manchester, it was agreed by all 10 LAs to produce a single Statement of Intent for all of the 10 LAs. Declarations of eligibility will only be issued for Greater Manchester-wide or Local Authority-led schemes via the affordable warmth service operating in each district.

The statement can be viewed via this link:

<https://www.greatermanchester-ca.gov.uk/what-we-do/environment/homes-workplaces-and-public-buildings/domestic-and-non-domestic-energy-efficiency/>

Please answer the following questions to help us to understand LA Flex delivery in more detail:

- **How many declarations were issued for low income vulnerable households?**

Since April 2019 in Trafford 17 LA Flex declarations have been issued.

- **How many declarations were issued for Fuel Poor households?**

17 LA Flex declarations

- **How many declarations were issued for in-fill?**

Zero

- **What is the highest income cap published in your Sol?**

£26,800 for 2 or more adults with 4 or more children in a household.

- **If you have used an income over £30k gross, what reason have you given?**

To be eligible, a household must be low income, and have high-cost energy costs (LIHC).

High energy costs (HC) can be evidenced in one of two ways:

1. Having an Energy Performance Certificate (EPC) of band E, F or G; or
2. If the household has no EPC, or it is inaccurate, then an LA or its affordable warmth service may score the responses to the set of questions provided in Table 2 of Annex 6 of the BEIS ECO3 Flexible Eligibility Guidance. A score of 40 or above would confirm the household as High Cost (HC).

Alternatively, an eligible applicant would need to be identified as low income and vulnerability to cold (LIVC). To be eligible through this route, a household must have an income lower than the relevant threshold AND contain one of the following:

- A person with a mental or physical health condition caused or exacerbated by living in a cold home;
- A person with a disability;
- A person who is over 70 years of age;
- A person who is under five years of age;
- A person who is pregnant;
- A person who is terminally ill;
- A person with a suppressed immune systems (e.g. from cancer treatment or HIV);
- A person who moves in and out of homelessness;
- A person with addictions;
- A person who has attended hospital due to a fall;
- A recent immigrant, asylum seeker or refugee (if living in private tenure).

- **Do you charge for declarations to be signed? If so, please state how much?**

No.

11) Smart Metering

- **Please provide a brief statement outlining your current or planned approach to promote smart meter take up and supporting residents to achieve benefits.**

We have this under consideration and plan to include information on smart meters on the Council's website under energy efficiency improvements.

Among Residential Providers working across Trafford:

THT have this under consideration. They encourage tenants to take a smart meter but have not yet established what support they require or how to provide it.

GP promoted smart meters several years ago but no longer promote this currently.

IVH incorporated this into their Sustainability and Customer Voice strategies. They plan to involve customers in Carbon Literacy training or similar that will include the use of smart meters and other forms of energy saving to increase awareness of the benefits for all parties.

YHG have a Money Advise Team which has been proactive in promoting ways to avoid and overcome fuel poverty and increase efficiency. They advise customers to consider smart meters and where necessary their MAT support with the transition. However, they do not have a wider plan yet to promote to all residents only those that seek advice.

Arawak Walton do not have a position on smart meters.

MSV are presently rolling out a smart meter programme to all their own landlord stock and will be encouraging residents via their energy advisor assistance.

JHG started a project in February 2021 to ensure the introduction of smart meter take-up.

Onward Homes advised that measuring energy consumption is critical to the delivery of their Sustainable Retrofit Strategy. They are currently deciding on the best metrics to be used to monitor and verify the impact of their retrofit proposals and interventions for tenants at design and after works are completed. Smart metering, monitoring, and verification will be an integral part of their Strategy; however, they must ensure that tenants are not compromised when choosing to change energy provider etc. and that behaviourally a smart meter does not heighten fuel usage anxiety and further fuel poverty.

AHG provide a free and confidential advice service known as Be Wise which offers practical help to all AHG residents and colleagues. Their EnergyWise service provides help to find the best energy prices, assistance to switch and information on other services from energy suppliers including smart metering.

- **Please provide further information on activities relating to smart metering, including but not limited to:**

a. Integrating approaches to delivering energy efficiency improvements in residential accommodation.

We plan to include information on smart meters on the Council's website under energy efficiency improvements.

b. Arranging for smart meters to be installed by energy suppliers in vacant social housing premises.

This would need to be done and arranged by the Registered Providers who are the owners of the social housing stock in Trafford. We contacted them for info on whether this is being done, and their responses are below:

THT – does not arrange this. They state the smart meter programme is driven by energy suppliers who want to run the programmes, not by ad hoc installations.

GP – Do not arrange this. They have a programme to install smart meters wherever there is a landlord supply.

IVH - Not currently, however we are currently discussing this with British Gas who are engaged as our supplier during void works.

YHG – have an agreement with British Gas which enables them to transfer the utility supply at the void start and take opportunity to install smart meters during the void period. There were 12 new smart meters installed last year in Trafford as part of this process.

MSV - No we have not gone down that route as yet.

JHG are using an external company (Energy Angels) to install smart meters in all void properties but none have been installed in Trafford properties as yet.

Arawak Walton do not arrange for installation of smart meters.

Onward Homes do not currently arrange for the installation of smart meters.

AHG do not arrange smart meter installations.

c. Using social landlords to promote smart meter uptake.

As above

d. Including smart meters in landlord licencing schemes.

No current planned approach

e. Supporting residents who have had appliances condemned for safety reasons.

The current HEART scheme, delivered via LEAP, has recently expired. Planning is underway to reopen the scheme in September 2021, subject to funding.

f. Other supporting activities.

N/a

12) Future Schemes and Wider Incentives

- **Please outline any further schemes or wider initiatives not covered above that your local authority has carried out or is planning to undertake to improve energy efficiency in residential accommodation.**

N/a